

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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VLADIMIR KUSH,

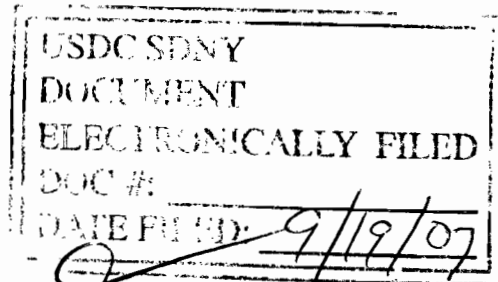
Plaintiff,

-against-

ALECIA MOORE p/k/a "PINK,"  
ZOMBA LABEL GROUP,  
LAFACE RECORDS, RADICAL MEDIA, and  
JOHN OR JANE DOES 1 THROUGH 3, inclusive,  
Defendants.

**PROPOSED**  
**SCHEDULING ORDER**

Index # 07-CV-7018 (SS)



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WHEREAS, the Court issued an Order for a Conference in accordance with Fed.  
R. Civ. P. 16(b) on August 23, 2007 (the "Order"); and

WHEREAS, the Order requires that the parties jointly prepare and sign a  
proposed scheduling order containing certain information;

NOW, THEREFORE, the parties hereby submit the following information as  
required by the Order:

1. Initial Case Conference Date: September 18, 2007

DORSEY & WHITNEY LLP  
250 Park Avenue  
New York, New York 10177-1500  
(212)545-4000  
Marc S. Reiner

LAW OFFICES OF JULIAN D. RILEY JR., P.C.  
43 Clarkson Street, Ground Floor  
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(212)625-2525  
Julian D. Riley Jr. (JR 2163)

ATTORNEYS FOR DEFENDANTS  
**RADICAL MEDIA, ZOMBA LABEL  
GROUP, and LaFACE RECORDS**

ATTORNEYS FOR PLAINTIFF  
**VLADIMIR KUSH**

2. Concise Statement of Case: Complaint alleges copyright infringement featuring an original painting in a popular music video.
3. Depositions to be completed by February 28, 2008.
  - a. Unless counsel agrees otherwise, or the Court so orders, *here to* depositions are not to be held until all parties *JDR* have responded to any first requests for production of documents.
  - b. Names of those to be deposed to be determined at a later date.
  - c. Depositions shall proceed concurrently.
  - d. Whenever possible, unless counsel agrees otherwise, or the Court so orders, non-party depositions shall follow party depositions.
  - e. Unless counsel agrees otherwise, or the Court so orders, depositions shall be conducted in accordance with Rule 30.
4. Experts, if any, are to be designated by January 15, 2008, and experts' reports exchanged no later than February 29, 2008, and any rebuttal reports to be submitted by March 21, 2008. Experts may be deposed, and such depositions will be completed by April 11, 2008.
5. Production of Documents:
  - a. First requests for production of documents, if any, are to be served no later than October 9, 2007.
  - b. First requests for interrogatories, if any, are to be served no later than October 9, 2007.

- c. All discovery is to be completed by April 11, 2008.
6. The plaintiff will supply its pre-trial order matters to defendants by April 30, 2008.
7. The final pre-trial conference in this matter shall be held on March 18 at 4<sup>30</sup>
8. The parties are likely to submit a stipulated protective order concerning the disclosure of confidential information.
9. The parties have no discovery issues of concern at this time.
10. Expert testimony, if any, is anticipated in the matter of determining damages.
11. The joint pretrial order shall be filed no later than May 12, 2008. The requirements for the pre-trial order and other pre-trial submissions shall be governed by the Court's Individual Rules of Practice.
12. All motions and applications shall be governed by the Court's Individual Rules of Practice.
13. Counsel consent to trial by a United States Magistrate Judge:

Yes \_\_\_\_\_

No XX

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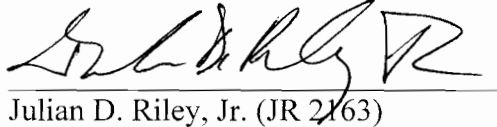
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14. This Scheduling Order may only be altered or amended upon a showing of good cause not foreseeable at this initial conference, or as justice requires.



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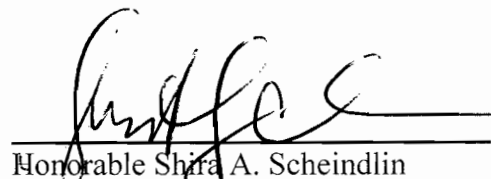
Next Case Management Conference

March 18 at 4<sup>30</sup>  
(to be completed by the Court)

SO ORDERED:

DATED: Sept. 18, 2007

New York, New York

  
Honorable Shira A. Scheindlin  
United States District Judge, SDNY